

1 PAUL L. REIN, State Bar No. 43053  
2 CELIA MCGUINNESS, State Bar No. 159420  
3 CATHERINE CABALO, State Bar No. 248198  
4 LAW OFFICES OF PAUL L. REIN  
5 200 Lakeside Drive, Suite A  
6 Oakland, CA 94612  
7 Telephone: (510) 832-5001  
8 Facsimile: (510) 832-4787  
9 [reinlawoffice@aol.com](mailto:reinlawoffice@aol.com)

10 Attorneys for Plaintiff  
11 NICOLE BROWN-BOOKER

12 \* *Defendants and their respective counsel listed after the caption.*

13 UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 NICOLE BROWN-BOOKER,  
16 Plaintiff,

17 v.

18 BRISTOL FARMS, INC. dba BRISTOL  
19 FARMS; EMPORIUM MALL, LLC;  
20 WESTFIELD GROUP; and DOES 1-20,  
21 Inclusive,

22 Defendants.

Case No. C12-6563 PJH

Civil Rights

**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL WITH  
PREJUDICE PURSUANT TO FED. R.  
CIV. P. 41(a)(1)(A)(ii)**

23 WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP  
24 DAVID S. EISEN, ESQ. (State Bar No. 100623)  
25 555 S. Flower Street, Suite 2900  
26 Los Angeles, CA 90071-2407  
27 Telephone: 213/443-5100  
28 Facsimile: 213/443-5101  
[david.eisen@wilsonelser.com](mailto:david.eisen@wilsonelser.com)

Attorneys for Defendant  
BRISTOL FARMS, INC. dba  
BRISTOL FARMS

RYAN J. LARSEN, Esq. (SBN 211622)  
KATTEN MUCHIN ROSENMAN LLP

STIPULATION AND [PROPOSED] ORDER FOR  
DISMISSAL WITH PREJUDICE

2029 Century Park East, Suite 2600  
Los Angeles, CA 90067  
Telephone: 310/788-4400  
Fax: 310/712-8269

Attorneys for Defendants WESTFIELD GROUP  
and EMPORIUM MALL, LLC

**TO THE CLERK OF THE ABOVE ENTITLED COURT AND TO ALL PARTIES AND  
TO THEIR RESPECTIVE ATTORNEYS OF RECORD:**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), plaintiff Nicole Brown-Booker (“Plaintiff”) and defendants Bristol Farms, Inc. dba Bristol Farms; Westfield Group; and Emporium Mall, LLC (“Defendants”), by and through their respective counsel of record, hereby STIPULATE that Plaintiff’s action against Defendants be dismissed *with prejudice*. This Stipulation of Dismissal with prejudice is made pursuant to the terms and conditions of an earlier-filed Court-Enforceable Settlement Agreement and Release, which resolves Plaintiff’s claims for injunctive relief, damages, attorney fees, litigation expenses, and costs -- and provides for this Court’s continued jurisdiction for enforcement purposes.

**IT IS SO STIPULATED.**

Dated: July 10, 2014

**LAW OFFICES OF PAUL L. REIN**

By: /s/ Catherine Cabalo  
Catherine Cabalo, Esq.  
Attorneys for Plaintiff  
NICOLE BROWN-BOOKER

Dated: July 10, 2014

**WILSON ELSEER MOSKOWITZ EDELMAN &  
DICKER LLP**

By: /s/ David Eisen  
David Eisen, Esq.  
Attorneys for Defendant BRISTOL FARMS, INC. dba  
BRISTOL FARMS

1 Dated: July 10, 2014

**KATTEN MUCHIN ROSENMAN LLP**

2  
3 By: /s/ Ryan Larsen  
Ryan Larsen, Esq.

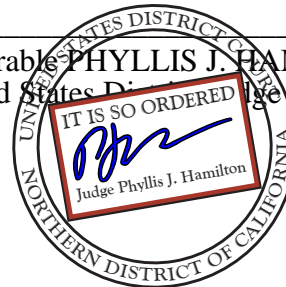
4 Attorneys for Defendants EMPORIUM MALL, LLC &  
WESTFIELD, LLC

7 **ORDER**

8 Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.

10  
11 Dated: July 11, 2014

12 Honorable PHYLLIS J. HAMILTON  
United States District Judge



**FILER'S ATTESTATION**

Pursuant to General Order 45, section X(B), I hereby attest that on July 10, 2014, I, Catherine Cabalo, received the concurrences of David Eisen and Ryan Larson in the filing of this document.

/s/ Catherine Cabalo  
Catherine Cabalo, Esq.